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April 9, 2025

VIA E.C.F.

Honorable Naomi R. Buchwald
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Pineiro v. the City of New York, et al.
24-CV-6002 (NRB) (RFT)

Your Honor:

I am an Assistant Corporation Counsel Counsel in the Office of Muriel Goode-Trufant, Corporation Counsel of the City of New York, and the attorney representing the Defendants in the above captioned matter. The City writes on behalf of the parties to propose dates for discovery in this case. The proposed discovery schedule is as follows:

Initial Disclosures: April 29, 2025

Document Requests and Interrogatories: May 16, 2025

Fact Discovery Completed: August 27, 2025

Additionally, the parties anticipate Plaintiff will call two (2) experts and Defendants will call two (2) rebuttal experts. The parties propose the following schedule for expert discovery:

Exchange of Affirmative Expert Disclosures: September 26, 2025

Exchange of Rebuttal Expert Disclosures: October 27, 2025

Expert Depositions Completed: November 26, 2025

Expert Discovery and All Discovery Completed: November 26, 2025

The parties thank the Court for its time and consideration herein.

Respectfully submitted,

/s/ Jessica M. Ochoa

Jessica Ochoa

Assistant Corporation Counsel

cc: **By ECF**

Jason Leventhal, Esq.

Joshua Moskovitz, Esq.

Attorneys for Plaintiff